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Comments: Ref: Catamount Spring Creek Project 63036 Scoping Letter 10/18/2022

Ref: 20221102 NSJB Stakeholders Meeting Notes JJB.pdf

Ref: National Geographic Topographic Map # 145 sold at Columbine Range Station

The Catamount Spring Creek Project Scoping Letter references the recompletion of one gas well and the horizontal drilling of seven new gas wells along with installation of pipelines that follow an existing disturbance corridor that includes roads, a natural gas pipeline and an overhead power line. Information provided during the November 2, 2022 NSJB Stakeholders meeting confirmed that a 24 inch pipeline to transport methane from the wells to the lower southern end of FS 537 is proposed. A 6 inch pipeline to carry production water from the wells to that same end location is also planned.

A question regarding the intended discharge and disposition of the Spring Creek methane production was asked. The answer provided was that a connection port was available at a pigging station located at the south end of FS 537 and the intention is to connect the proposed 24 inch pipeline from the Pargin Mountain leases to an existing gathering line via that connection port. Specific information regarding the operating pressure of the 24 inch methane pipeline was not available at the meeting. It was also stated that no compressor station in conjunction with this project is proposed.

Generally speaking, production from Fruitland coal bed seams involves an on-going de-watering process during the production phase. Presumably the proposed six inch production water pipeline is intended to carry the produced water from the wells to the south end of FS 537. No information has been provided that documents the disposition of this produced water at that point.

The de-watering process requires motor driven pump jacks to lift the coal seam water to the surface for further disposition. Two options exist to power the pump jacks: either electric motors or well head methane fueled engines. Unfortunately, the Scoping Letter did not designate which of these two options Catamount intends to use. Each option has implications that are relevant to an EA for the Catamount Spring Creek Project.

If the electric motor option is chosen, will distribution grid power lines also be installed as part of the road and pipeline installation process? If so, does that alter the MOA for the Archeological District section? Would those power lines be buried with the pipelines or run overhead?

If the well head methane fueled engine option is chosen, then issues regarding noise and exhaust disturbance of wintering deer and elk arises. It may also imply more frequent maintenance access. Air quality contamination is also an issue unless pre-processing of well head methane at the well to remove fracking contaminants is performed before the methane is used as engine fuel at the well.

In either case, it would seem prudent that evaluation of power requirements for the eight wells and how Catamount proposes to provide it is a necessary component of the project EA.

An additional issue is perhaps worth an evaluation by a qualified expert or addressed by Catamount. If the National Geographic Topographic Map # 145 is used as reference it appears that the Pargin MTN UT 2 well pad location is at approximately 8800 foot elevation. From the map it also appears that the lower end of FS 537 is at approximately 6800 foot elevation. From information provided in the proposed action in the Scoping letter, a produced water continuous pipeline will be run from the well elevation to the lower end of FS 537. That represents an elevation change of approximately 2000 feet.

Considering that the static head pressure in a column of water is approximately one-half psi per foot of water column height, that suggests that a static water column pressure created between the top of the produced water pipeline at the wells and the end of the pipeline at the terminus of FS 537 could be as much as 1,000 psi depending on potential charge and discharge flow rates.

Has the produced water pipeline been designed to handle this pressure? How will this pressure be reduced if the produced water will be injected into an existing produced water line at a connection port at the end of FS 537 that cannot handle such pressure? If the produced water flow from the wells is intermittent and the produced water line contains gas pockets, then there is also the issue of pressure peaks from water slugs propagating down the

long pipeline that create a hydraulic ram effect at the terminus.

It is recommended that the Catamount Spring Creek Project EA include an in-depth evaluation of the potential issues and risks associated with pressures developed in a continuous produced water pipeline with a 2,000 foot elevation differential between its upper and lower ends.